

AMENDMENTS TO THE DRAWINGS

The attached sheet of drawings includes changes to Fig. 2. This sheet, which includes Fig. 2, replaces the original sheet including Fig. 2.

Attachment: Replacement Sheet

REMARKS

In The Drawings

Figure 2 was objected to as failing to comply with 37 CFR 1.84(p)(5) because it did not include reference numbers “15-3” and “15-4.” Accordingly, Applicant has amended Fig. 2 to comply section 1.84(p)(5). Withdrawal of the objections is kindly requested.

The Section 102 Rejections

Claims 1, 15, 20 and 34 were rejected under 35 USC 102(b) as allegedly being anticipated by Marveli et al., U.S. Patent No. 5, 572, 221 (hereinafter “Marveli”); claims 1-2, 4-5, 20-21 and 23-24 were rejected under 35 USC 102(e) as allegedly being anticipated by Matsumoto et al. Pub. No.: US 2002/0132628 (hereinafter “Matsumoto”); claims 1, 3-4, 6-9, 11-14, 16-17, 19-20, 22-23, 25-28, 30-33, 35-36 and 38 were rejected under 35 USC 102(e) as allegedly being anticipated by Garceran et al. US Patent No. 6, 522,888 (hereinafter “Garceran”); and claims 1, 3-4, 16-19 20, 22-23 and 35-38 were rejected under 35 USC 102(e) as allegedly being anticipated by Cohen et al. US Patent No. 6, 463, 265 (hereinafter “Cohen”). Applicants disagree and avoid these rejections for at least the following reasons.

Initially, Applicants respectfully submit that neither Marveli, Matsumoto, Garceran nor Cohen discloses or suggests a method for controlling handoffs in

a wireless communication system using a received location vector that is associated with a mobile unit, and includes 3-dimensional terrestrial data, as in Applicants' amended claims.

Instead, Marlevi appears to disclose the determination of a mobile's next location based on previously stored locations and a current location. This determination uses stored "itinerary pattern information." However, this information does not include 3-dimensional terrestrial data.

Matsumoto appears to disclose a triangulation technique where the distances between a mobile and three base stations are determined and then used as a factor in performing a hand-off. As in Marlevi, the technique described in Matsumoto does not appear to use 3-dimensional terrestrial data.

Garceran appears to disclose two-dimension location information (latitude and longitude coordinates) not 3-dimensional terrestrial information, while Cohen appears to disclose a variety of location determination techniques, none of which use 3-dimensional terrestrial data.

Accordingly, because neither Marlevi, Matsumoto, Garceran nor Cohen discloses each and every feature of the claimed inventions, neither Marlevi, Matsumoto, Garceran nor Cohen can provide a basis for rejection under 35 U.S.C. §102. Reconsideration, withdrawal of the rejections and allowance of claims 1-9, 11-28 and 30-38 is respectfully requested.

The Section 103 Rejections

Claims 10 and 29 were rejected under 35 USC 103(a) as allegedly being unpatentable over Cohen in view of Jolma, U.S. Patent No. 6, 001,971 (“Jolma”). Applicants disagree and traverse these rejections.

Applicants respectfully submit that claims 10 and 29 depend on independent claims 1 and 20 and are, therefore, allowable for at least the reasons stated above with respect to claims 1 and 20.

Applicants respectfully requests withdrawal of the pending rejections and allowance of claims 10 and 29.

Should there be any outstanding matters that need to be resolved in the present application, the Examiner is respectfully requested to contact John E. Curtin at the telephone number of the undersigned below.

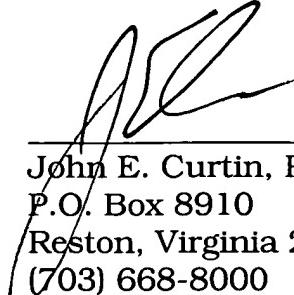
In the event this Response does not place the present application in condition for allowance, applicant requests the Examiner to contact the undersigned at (703) 668-8000 to schedule a personal interview.

If necessary, the Commissioner is hereby authorized in this, concurrent, and future replies, to charge payment or credit any overpayment to Deposit Account No. 08-0750 for any additional fees required under 37 C.F.R. § 1.16 or under 37 C.F.R. § 1.17; particularly, extension of time fees.

Respectfully submitted,

HARNESS, DICKEY, & PIERCE, P.L.C.

By


John E. Curtin, Reg. No. 37,602
P.O. Box 8910
Reston, Virginia 20195
(703) 668-8000

JEC/ZBH:ame